

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

RYAN KOENIG, JAMES KOENIG, II, on)	
behalf of themselves and all others similarly)	
situated,)	
)	
Plaintiffs)	Cause No. 4:13-CV-00477 SNLJ
)	
vs.)	
)	
BOURDEAU CONSTRUCTION, LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR A CREDITOR'S BILL IN EQUITY
AND TO PIERCE THE CORPORATE VEIL**

COME NOW Plaintiffs, Ryan Koenig, James Koenig II, Vince Nack and James Craig Larkin (collectively as “**Plaintiffs**”), by and through their undersigned counsel, and pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and the established procedures of the State of Missouri regarding proceedings in aid of execution, hereby move this Court for equitable relief in the form of a creditor’s bill, to allow Plaintiffs to proceed to satisfy the judgment entered in this case from the property of Bourdeau Construction, LLC which is not subject to execution by normal means available at law.

Specifically, Plaintiffs move this Court to pierce the corporate veil of Bourdeau Construction, LLC, and permit Plaintiffs to satisfy their judgment from Bourdeau Contracting, LLC, as well as the sole owner and alter ego of Bourdeau Construction and Bourdeau Contracting, James M. Bourdeau.

Plaintiffs have no adequate legal remedy. Further grounds supporting the use of a creditor's bill and piercing the corporate veil are set forth in the accompanying memorandum of law, a copy of which was filed contemporaneously herewith.

Respectfully submitted,

WEISS ATTORNEYS AT LAW P.C.

/s/ James G. Nowogrocki

James G. Nowogrocki, #38559MO

Richard D. Worth, #61025MO

1015 Locust, Suite 400

St. Louis, Missouri 63101

Phone: 314-588-9500

Facsimile: 314-588-9595

Email: jnowogrocki@weisslawstl.com

rworth@weisslawstl.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of December 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Anthony Pezzani
ENGELMEYER & PEZZANI, LLC
13321 North Outer Forty, #300
St. Louis, MO 63017
tony@epfirm.com
Attorneys for Defendant

/s/ James G. Nowogrocki